

Worksheet
Documentation of Land Use Plan Conformance and Determination of NEPA Adequacy (DNA)

U.S. Department of the Interior
Utah Bureau of Land Management (BLM)

The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

A. BLM Office: Vernal Field Office (UT-080)

Proposed Action Title: May 22, 2007 Competitive Oil and Gas Lease Sale

Location of Proposed Action: Parcels within Duchesne, Grand, and Uintah Counties, Utah. Attachment 1 contains legal descriptions for each parcel.

Description of the Proposed Action: The Utah State Office proposes to offer 27 parcels of land in Duchesne, Grand, and Uintah Counties, Utah administered by the Vernal Field Office for oil and gas leasing in a competitive lease sale to be held on May 22, 2007. All 27 parcels were assessed for land use plan compliance and NEPA adequacy. Eight (8) parcels are located in Duchesne County, Utah, 1 parcel is located in Grand County, Utah and 18 parcels are located in Uintah County, Utah. Attachment 1 lists all parcels including special lease stipulations and lease notices. These parcels include public lands or lands in which the mineral estate is administered by the BLM. If a parcel of land is not purchased at the lease sale by competitive bidding, it may still be leased within two years after the initial offering under a current review of NEPA adequacy. A lease may be held for ten years, after which the lease expires unless oil or gas is produced in paying quantities. A producing lease can be held indefinitely by economic production.

Planning decisions place certain lands in a no leasing category. Most lands are leased with minor stipulations attached to the lease from the appropriate land use plan for the area. Some lands are leased with limited areas of no surface occupancy within the lease boundaries. Some lands are leased with no stipulations other than those found on the standard lease contract form. A lease grants the right to drill for oil and gas, at some location on the lease.

A lessee must submit an Application for Permit to Drill (APD) (Form 3160-3) to the BLM for approval and must possess an approved APD prior to any surface disturbance in preparation for drilling. Any stipulations attached to the standard lease form must be complied before an APD may be approved. Following BLM approval of an APD, a lessee may produce oil and gas from the well in a manner approved by BLM in the APD or in subsequent sundry notices. The operator must notify the appropriate authorized officer, 48 hours before starting any surface disturbing activity approved in the APD.

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name:

Environmental Analysis Record Oil and Gas Leasing Program Vernal District Office Utah,
approved June 1975

Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement (DMRMP/EIS), approved December 21, 1994

Book Cliffs Resource Area Resource Management Plan and Environmental Impact Statement (BCRMP/EIS), approved June 3, 1985

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

- Environmental Analysis Record on page VIII-1 found no significant adverse impacts to the environment from leasing, and recommended that an environmental impact statement was not necessary.
- The Record of Decision (ROD) for the DMRMP/EIS in Chapter 2, on page 2-30 and Appendix 2 identifies those specific lands within the Diamond Mountain Resource Area that are available for leasing. The DMRMP/EIS' Appendix 2 contains pertinent stipulations and lease notices.
- The Record of Decision (ROD) for the BCRMP/EIS in Chapter 2, on pages 7 through 24, identifies those specific lands within the Book Cliffs Resource Area that are available for leasing.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

- Environmental Analysis Record Oil and Gas Leasing Program Vernal District Office Utah, approved June 1975
- Diamond Mountain Resource Area Resource Management Plan and Environmental Impact Statement (DMEIS), 1993
- Book Cliffs Resource Area Resource Management Plan and Environmental Impact Statement (BCEIS), 1985.
- Environmental Assessment for Oil and Gas Leasing in the Book Cliffs Resource Area, UT-080-89-002, 1988.
- Supplement to Environmental Assessment for Oil and Gas Leasing in the Book Cliffs Resource Area, UT-080-89-002, 1989.
- Draft Vernal Resource Management Plan and Environmental Impact Statement UT-GI-04-001-1610, 2005.

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessments, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring report).

REVIEW

State of Utah Sensitive Species List
Interdisciplinary Team Review
Attachment 2, Consolidated Resource Review

DATE

2001
March 22, 2007
March 8, 2007

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Documentation of answer and explanation:

Leasing of the lands described in Attachment 1 was analyzed in the Environmental Analysis Record, BCRMP/EIS and the DMRMP/EIS. The proposed action - leasing for oil and gas in the May 2007 sale - is substantially the same as the proposed action analyzed in each of the above environmental documents. Public land would be offered for leasing, and exploration and development for oil and gas resources may occur dependent on specific approval by the BLM and dependent on site-specific NEPA analysis. If land is leased, a lessee would be afforded rights to explore for and to develop oil and gas, subject to the lease terms, regulations, and laws.

The Environmental Analysis Record in Chapter 3, page III-1 described the affected environment. Chapter 4 page IV-1 describes the impacts of the proposed action and other alternatives. It considered both the no leasing and leasing alternatives.

The BCRMP/EIS, in Chapter 3, page 93, of the Environmental Impact Statement (EIS) described the affected environment. Chapter 4, page 205, describes the impacts of the proposed action and other alternatives. The ROD, Chapter 2, pages 7 through 24, provides the decision to lease.

The DMRMP/EIS in Chapter 3 describes the affected environment. Chapter 4 describes the impacts of the proposed action and other alternatives. The ROD for the DMRMP/EIS, in Chapter 2, page 2-30 and Appendix 2, identifies those specific lands within the Diamond Mountain Resource Area that are available for leasing. Appendix 2 contains pertinent stipulations and lease notices.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

Documentation of answer and explanation:

The 1975 Environmental Analysis Record analyzed the impacts of oil and gas leasing in the resource area under two alternatives. The two alternatives were leasing and no leasing.

The BCRMP/EIS analyzed the impacts of oil and gas leasing for all lands in the resource area under four different alternatives. The four alternatives ranged from emphasizing oil and gas exploration and development to minimizing oil and gas exploration and development with varying degrees of exploration and development activities in between and varying stipulations (restrictions) for each alternative. The Current Management Alternative, or No Action Alternative, was also analyzed. The Balanced Use Alternative provided for the development of non-renewable resources while protecting critical surface resources. This alternative was the BLM's Proposed Action and Preferred Alternative.

The DMRMP/EIS analyzed the impacts of oil and gas leasing on all lands in the resource area under five different alternatives. The five alternatives ranged from emphasizing oil and gas exploration and development to minimizing oil and gas exploration and development with varying degrees of exploration and development activities in between varying stipulations (restrictions) for each alternative. The No Action Alternative was also analyzed. The Proposed Plan (Alternative E) provided for the leasing and development of resources while identifying the measures necessary to protect or enhance environmental values.

The alternatives analyzed, and the range of alternatives, are still appropriate for this action.

3. **Is existing analysis adequate in light of any new information or circumstances Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?**

Documentation of answer and explanation:

The Vernal Field Office (VFO) reviewed the preliminary lease parcels through an interdisciplinary (ID) team approach. Resource information provided by agencies or the public has been reviewed by the appropriate resource specialist. Resources typically analyzed in existing NEPA documents include recreation, water, soils, wildlife, cultural resources, visual resources, etc. Review by the specialist determines if the information provided about resources for preliminary parcels is new and significant.

The VFO received the draft May 2007 competitive oil and gas lease sale parcel list on January 31, 2007. Copies of the complete list were provided to the interdisciplinary team on February 5, 2007 to complete data review. On February 20, 2007, the ID team of resource specialists, identified in Part E of this DNA, met to review the preliminary lease parcels. As part of the review process, the alternatives analyzed in the Environmental Analysis Record for Oil and Gas Leasing in Vernal, the BCRMP/EIS and the DMRMP/EIS were reviewed for resource impact from oil and gas leasing. Other manuals and policies were reviewed.

Individual members of the ID team reached conclusions regarding the adequacy of existing NEPA documentation. The review reports and rationale documented by these specialists are found in Attachment 2. The BLM VFO management then conducted an additional multiple-use review to further consider the significance of any new information and/or circumstances in light of the existing oil and gas lease categories, all required stipulations and relevance of information found in the Draft Vernal RMP revision. The results of these reviews for the parcels recommended for sale in the May 2007 lease sale are presented below.

The BLM VFO management considered the following to determine if the existing NEPA analysis is adequate for the leasing of the parcels listed in Attachment 1:

- ✓ Environmental Analysis Record
- ✓ The existing BCRMP/EIS and ROD
- ✓ The existing DMRMP/EIS and ROD
- ✓ Applicable laws, regulations and BLM policy
- ✓ Interdisciplinary Team Review Attachment 2
- ✓ Leasing categories
- ✓ The Draft Vernal RMP

New information, none of which is significant is described below.

Cultural Resources: A cultural resources report was prepared (see Attachment 2) to consider known and projected cultural properties for the 17 parcels analyzed in this document. The location for each parcel is described in a list provided by the Utah BLM State Office, Branch of Fluid Minerals, Salt Lake City, Utah in February, 2007 to the Vernal Utah BLM Field Office. The analytic unit/APE is the lease sale parcel's external boundary as defined in the lease document.

Data was derived from the Cultural Program files which include: 1. 7.5' topographic quadrangles, 2. 7.5' orthophotoquads with inventory and site overlays, 3. pertinent studies and reports which cover the areas of concern. These include the 1980 Seep Ridge Statistical study; and 4. Spangler's Vernal District Office 1985 regional overview.

This class 1 overview addresses the archaeology of the May, 2007 oil & gas lease sale and utilizes data current to the date of this document, February, 2007. This data has been utilized in APD processing, ROW and other NEPA documentation.

To assure appropriate consideration of future effects from the May, 2007 lease sale, the BLM will add the following "lease stipulation" (WO-IM-2005-003), to all parcels offered for lease.

"This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration, or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated." (WO-IM 2005-03).

Environmental Justice: This review is for all parcels – According to the EPA Region VII, State of Utah Environmental Justice Map, the Uintah Basin has been categorized as a minority population area of 10 to 20% and a poverty population area of 10 to 20% (<http://www.epa.gov/enviro/ej>, 9/7/04). The leasing of these parcels would not cause any disproportionately high and adverse human health or environmental effects on minority populations, low-income populations, or Indian Tribes.

Invasive, Non-native Species: Noxious weed introduction is limited by standard operating procedures and best management practices used as conditions of approval for surface use authorizations. These practices include, equipment washing, inspections and treatments to limit the spread or introduction of invasive, not-native species.

Native American Religious Concerns: On January 31, 2007 certified consultation letters were sent to the following Tribes: Confederated Tribes of the Goshute Reservation, Laguna Pueblo Tribe, Santa Clara Pueblo Tribe, Zia Pueblo Tribe, Hopi Tribe, Navajo Nation, Eastern Shoshone Tribe, Northwestern Band of the Shoshone Nation, Ute Indian Tribe, Southern Ute Tribe, White Mesa Ute Tribe, and the Ute Mountain Ute Tribe. The letter requested comments to be provided to the VFO within 30 days after receipt of the letter. On February 12, 2007 a letter was received from the Pueblo of Laguna Tribe stating that the proposed undertaking will not have a significant impact at this time. However, in the event that any new archaeological sites are discovered and any artifacts are recovered, the Pueblo of Laguna would like to be notified to review items and if possible furnish photographs of items. The last return receipt was dated February 15, 2007. As of April 6, 2007 no other concerns pertaining to leasing of the preliminary parcels have been received. Consultation is considered to be closed.

Special Status Species: In consideration of the 17 parcels from preliminary lease sale list for the May 2007 lease sale, a special status animal species and wildlife report and a special status plant species report have been prepared and can be reviewed in attachment 2. All appropriate lease notices and stipulations for federally listed and state sensitive species have been applied where species and/or habitat occur in association with these parcels. In accordance with Washington Office Instruction Memorandum No. 2002-174, all parcels would be subject to the Endangered Species Act Section 7 Consultation Stipulation. This stipulation is as follows:

"The lease area may now or hereafter contain plants, animals or their habitats determined to be threatened, endangered, or other special status species. BLM may recommend modifications to exploration and development proposals to further its conservation and management objective to avoid BLM-approved activity that would contribute to a need to list such species or their habitat. BLM may require modifications to or disapprove proposed activity that is likely to result in jeopardy to the continued existence of a proposed or listed threatened or endangered species or result in the destruction or adverse modification of a designated or proposed critical habitat. BLM will not approve any ground-disturbing activity until it completes its obligations under applicable requirements of the Endangered Species Act as amended, 16 U.S.C. 1531 et seq. including completion of any required procedure for conference or consultation."

In December 2004, BLM and U.S. Fish and Wildlife Service personnel completed work on a set of programmatic level, lease notices for federally listed species occurring in Utah, that are to be attached to oil and gas leases offered in the State of Utah. On December 13, 2004, section 7 consultation was initiated with the submission of a memorandum to FWS, containing the lease notices. The FWS responded with a memorandum dated December 16, 2004 concurring with the BLM determination that attachment of the lease notices to appropriate lease parcels would constitute a "may affect, but not likely to adversely affect" determination for listed species in Utah. Detailed information on the inclusion of the appropriate lease notices and stipulations are contained in Attachments 1 and 2.

Based on the information and analysis provided in Attachment 2, and inclusion of all appropriate lease notices and stipulations, the May 2007 sale of oil and gas lease parcels complies with the 2004 FWS programmatic consultation and determination and no listed species are likely to be adversely affected by the proposed action.

Potential ACECs: Potential ACECs identified in the draft Vernal RMP were reviewed to determine if the identified relevant and important values constituted new significant information. GIS was used to identify parcels within potential ACECs considered in Alternative C (has the most conservation potential) of the draft RMP that would be managed as either Category 3 or Category 4 for oil and gas leasing as mitigation for identified relevant values. Conclusions of this review may be found in the consolidated interdisciplinary team review and report for basis of the deferral of the leasing in the affected areas. None of the 17 parcels recommended for the May 2007 lease sale occur within any potential ACEC.

Paleontological Resources: Several parcels (listed in the table under Section F of this DNA) are located on geologic formations that are known to contain vertebrate fossils. Lease notices to protect paleontological resources during ground disturbing activities have been applied to these parcels.

Floodplains: Parcels UT0507-087, UT0507-089, UT0507-094, UT0507-100 and UT0507- 118 are within lands that contain floodplains that were not addressed in the RMPs. A lease notice that

identifies the need to comply with the Floodplain Executive Order No 11988 would be added to the parcels and the resource would not be affected.

Riparian: Parcels UT0507-118 and UT0507-118 were not inventoried at the time the RMPs were completed. A lease notice identifying that modifications of surface use may be required for surface disturbing actions would be added to the parcels and protection would be afforded as discussed for riparian areas as discussed in the Diamond Mountain and Gook Cliffs RMPs.

Recreation: Parcels UT0507-055 and UT0507-056 fall within the White River/Strawberry Road Scenic Backway identified in the State of Utah Scenic Byways and Backways after completion of the Diamond Mountain RMP. Roads are designated for scenery as well as additional attributes such as history, recreation and archaeology. The Diamond Mountain RMP (pg 3.46) states that roads would be added as they qualify for inclusion into the Back-country Byway System. Application of standard operating procedures, best management practices, and the "200 meter rule" of 43 CFR 3101.1-2 would provide the opportunity to assure the scenic backway would be protected. These parcels are included within the Duchesne County transportation system. However, because they are Class D un-maintained roads, this is not new significant information.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Documentation and explanation:

The methodology and approach used in the analysis of all alternatives for the Environmental Analysis Record, BCRMP/EIS, DMRMP/EIS, and the Vernal Draft RMP identified under Part D.2, are still appropriate for the current proposed action. The methods of extractions, land requirements for exploration and development have not changed substantially since the documents were completed. Specifically the documents considered and analyzed the impacts resulting from preliminary investigations, exploratory drilling, development, production, and abandonment. The analyzed impacts considered in these documents have been verified through site-specific NEPA documents. These site specific documents may include analysis of any of these phases. Specifically EAs or EISs have been written that analyze the impacts of geophysical surveys (preliminary investigation), exploratory drilling and field development. Production and abandonment are also considered in the exploratory drilling and field development documents. The impact analysis disclosed in these documents verify the adequacy and accuracy of the general impact analysis in the EAR, BCRMP, DMRMP, and Vernal DRMP.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Do the existing NEPA documents analyze impacts related to the current proposed action at a level of specificity appropriate to the proposal (plan level, programmatic level, project level)?

Documentation and explanation:

Impacts from the current proposed leasing and subsequent drilling activities would be basically the same as those analyzed in the EISs associated with the BCRMP, DMRMP, and Vernal Draft RMP/EIS. This is because the proposed action is essentially the same and the existing resource

conditions and values have not changed since analysis in the EISs. The EISs used a somewhat general analysis of impacts, but these were tied to specific resources and values as present in the specific areas. Leasing categories were established dependent on resources and values in particular areas and stipulations were designed for each of these categories to protect these resources and values. The RFDs further defined expected impacts to specific exploration and production regions. These analyses are therefore region specific and allow region specific location and identification of potential impacts of the current leasing proposal.

Impacts from the current proposed leasing and subsequent drilling activities would be basically the same as those analyzed in the EAR. This is because the EAR analyzed, in general, the direct and indirect impacts of exploration and production activities that may result after an area, in the Vernal District Area is leased. Although the parcels currently under consideration were not specifically addressed, the impacts disclosed in the EAR are substantially the same as what may occur should the subject parcels be leased.

- 6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?**

Documentation and explanation:

The EISs and RFDs for the BCRMP, DMRMP, and Vernal DRMP included analysis of the potential collective and cumulative impacts of oil and gas leasing. Information regarding past actions are included in these documents. Reasonably foreseeable scenarios are also spelled out for each document. Each subsequent document shows the incremental increase of cumulative impacts, as would be expected for an ongoing minerals program. The cumulative impact scenarios disclosed in these documents have been verified through development NEPA documents. Because the reasonably foreseeable level of oil and gas activity analyzed previously is still appropriate; potential cumulative impacts are substantially unchanged from those analyzed in the EISs and RFDs.

- 7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

Documentation and explanation:

The public involvement and interagency review procedures and findings made through the development of the Environmental Analysis Record, Diamond Mountain Resource Area RMP/EIS, the Book Cliffs Resource Area RMP/EIS, and the Vernal Draft RMP/EIS are adequate for the proposed lease sale. During the development of the documents listed above, public workshops and meetings and public comments were received. All comments were responded to in the finalized documents.

- E. Interdisciplinary Analysis:** Identify those team members conducting or participating in the preparation of this worksheet. An Interdisciplinary checklist is attached to this DNA.

Name	Title	Resource Represented
Chuck Patterson	Outdoor Recreation Planner	ACECs, Recreation, VRM, Wild and Scenic Rivers
Stephanie Howard	Environmental Coordinator	Environmental Justice, Air Quality
Holly Villa	Natural Resource Specialist	LUP review, farmlands
Amy Torres	Wildlife Biologist	Special Status Animal Species, Wildlife
John Mayers	Geologist	Paleontology
Marilyn Wegweiser	Geologist	Paleontology
Blaine Phillips	Archaeologist	Cultural Resources, Native American Religious Concerns,
Merlin Sinfield	Engineering Technician	Hazardous and Solid Wastes
Clayton Newberry	Natural Resource Specialist	Special Status Plant Species, Invasive, Non-native Plant Species
Steve Strong	Natural Resource Specialist	Soils, Watershed
Karl Wright	Natural Resource Specialist	Floodplains, Wetlands, Riparian

The results of the ID team reviews are documented in Attachment 2

A "No Historic Properties Affected" determination was recommended for all parcels with sites that are ineligible. A "No Adverse Effect" determination was recommended for all offered parcels that contained eligible sites. This determination was forwarded to the Utah SHPO on (February 28, 2007). Concurrence with the determination was received from SHPO on (March 19, 2007).

On January 31, 2007 certified consultation letters were sent to the following Tribes: Confederated Tribes of the Goshute Reservation, Laguna Pueblo Tribe, Santa Clara Pueblo Tribe, Zia Pueblo Tribe, Hopi Tribe, Navajo Nation, Eastern Shoshone Tribe, Northwestern Band of the Shoshone Nation, Ute Indian Tribe, Southern Ute Tribe, White Mesa Ute Tribe, and the Ute Mountain Ute Tribe. The letter requested comments to be provided to the VFO within 30 days after receipt of the letter. On February 7, 2007 the Pueblo of Laguna Tribe responded stating that the proposed undertakings will not have significant impact at this time. However, in the event that any new archaeological sites are discovered and any artifacts are recovered, they would like to be notified to review items and if possible furnish photographs of items. As of April 6, 2007 no other concerns pertaining to leasing of the preliminary parcels have been received. Consultation is considered to be closed.

For the May 2007 lease sale the programmatic ESA consultation from December of 2004 with USFWS was followed.

- F. Mitigation Measures:** The following Lease Notices and/or Lease Stipulations should be applied to the identified, subsequent parcels (these are in addition to those applied by the Utah State Office).

LEASE STIPULATIONS- WO-IM

- 1. Lease Stipulation-Cultural Resources (WO-IM-2005-003); This Stipulation Shall be Applied to All Parcels**

"This lease may be found to contain historic properties and/or resources protected under the National Historic Preservation Act (NHPA), American Indian Religious Freedom Act, Native American Graves Protection and Repatriation Act, E.O. 13007, or other statutes and executive orders. The BLM will not approve any ground disturbing activities that may affect any such properties or resources until it completes its obligations under applicable requirements of the NHPA and other authorities. The BLM may require modification to exploration, or development proposals to protect such properties, or disapprove any activity that is likely to result in adverse effects that cannot be successfully avoided, minimized or mitigated." WO-IM 2005-03."

2. Lease Stipulation-Endangered Species Act Section 7 Consultation (WO-IM-2002-174): This Stipulation Shall be Applied to All Parcels.

*The lease area may now or hereafter contain plants, animals, or their habitats determined to be threatened, endangered, or other special status species. BLM may recommend modifications to exploration and development proposals to further its conservation and management objective to avoid BLM-approved activity that will contribute to a need to list such a species or their habitat. BLM may require modifications to or disapprove proposed activity that is likely to result in jeopardy to the continued existence of a proposed or listed threatened or endangered species or result in the destruction or adverse modification of a designated or proposed critical habitat. BLM will not approve any ground-disturbing activity that may affect any such species or critical habitat until it completes its obligations under applicable requirements of the Endangered Species Act as amended, 16 U.S.C. §1531 *et seq.*, including completion of any required procedure for conference or consultation.*

See attachment 1

CONCLUSIONS

Based on the review documented above, I conclude that:

Plan Conformance:

- ☒ This proposal conforms to the applicable land use plan.
- ☐ This proposal does not conform to the applicable land use plan

Determination of NEPA Adequacy

- ☒ The existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.
- ☐ The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.



Signature of the Responsible Official

4-6-2007

Date

Attachments – 3

- Attachment 1, Vernal Preliminary Parcel List
- Attachment 2, Consolidated Resource Review
- Attachment 3, Interdisciplinary Team Analysis Checklist